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January 22, 2020

VIA ECF AND FACSIMILE

Hon. Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street, Room 1050
New York, NY 10007

So ordered
1.22.20
Alvin K. Hellerstein

Re: **Reach Global Inc., et al. v. Ridenhour, et al.**, 20 cv 00391 (AKH)

Dear Judge Hellerstein:

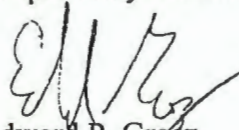
This firm represents the Plaintiffs Reach Global Inc., Reach Music Publishing, Inc. and Terrordome Music Publishing, LLC and Third-Party Defendant Michael Closter in the above-entitled action. This action was removed to this Court by Plaintiffs and Third-Party Defendant from New York State Supreme Court, New York County on January 15, 2020 pursuant to 28 U.S.C. § 1454, which provides that "A civil action in which any party asserts a claim for relief arising under any Act of Congress relating to . . . copyrights may be removed to the district court of the United States for the district and division embracing the place where the action is pending."

We respectfully request an extension of time for Plaintiffs and Third-Party Defendant to answer, move with respect to or otherwise respond to the Counterclaims and Third-Party Complaint interposed by Defendants to February 7, 2020. Before the case was removed, Defendants consented to extend Plaintiffs' and Third-Party Defendant's time from the original due date, January 5, 2020, to January 31, 2020. However, the removal of this action to this Court had the effect, under Federal Rule of Civil Procedure 81(c), of reducing Plaintiffs' and Third-Party Defendant's time to respond to the Counterclaims and Third-Party Complaint from the agreed date of January 31, 2020 to January 22, 2020. We are requesting an additional seven-day extension from the date the parties had agreed to prior to the removal.

Defendants have consented to this request. There are currently no scheduled dates in this matter.

I thank Your Honor in advance for considering this request.

Respectfully submitted,



Edward P. Grosz

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